

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

AMERICAN PATENTS LLC,

Plaintiff,

v.

TP-LINK TECHNOLOGIES CO., LTD.,

Defendant.

Civil Action No. 4:19-cv-765 ALM

**DECLARATION OF GUO HAIHUA IN SUPPORT OF
TP-LINK TECHNOLOGIES CO., LTD.'S MOTION TO
DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, Guo Haihua, declare as follows:

1. I am the Regulation Compliance Manager for TP-Link Technologies Co., Ltd. I submit this Declaration in support of TP-Link Technologies Co., Ltd.'s Motion to Dismiss for Lack of Personal Jurisdiction. I have personal knowledge of the matters stated in this Declaration.

2. TP-Link Technologies Co., Ltd is a privately-held corporation organized under the laws of China, and it maintains its headquarters and principal place of business at South Building, No. 5 Keyuan Road, Central Zone, Science & Technology Park, Nanshan, Shenzhen, China, Postcode 518057.

3. TP-Link Technologies Co., Ltd. does not have any employees or agents in Texas.

4. TP-Link Technologies Co., Ltd. does not own, lease or operate any offices, or other facilities, in Texas.

5. TP-Link Technologies Co., Ltd. does not design, manufacture, sell, or offer to sell any products in Texas.

6. TP-Link Technologies Co., Ltd. does not ship products to Texas, and it does not conduct any marketing or advertising in, or directed toward, Texas.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: January 29, 2020

Guo Haihua
Guo Haihua (Jan 29, 2020)

Guo Haihua